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11 IN THE UNITED STATES DISTRICT COURT
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13 FOR THE EASTERN DISTRICT OF CALIFORNIA

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15 UNITED STATES OF AMERICA,)
16 Plaintiff,) CR S-04-481 GEB
17 v.) STIPULATION AND ORDER RESETTING
18) STATUS CONFERENCE, AND EXCLUDING
19) TIME UNDER THE SPEEDY TRIAL ACT
20 RAHMAN ABUL SHADEBADI,)
21)
22 Defendant.)
23)

24 The United States of America, through its counsels of record,
25 McGregor W. Scott, United States Attorney for the Eastern District
of California, and William S. Wong, Assistant United States
Attorney, and defendant Rahman Abul Shadebadi, through his counsel
of record, Peter Kmeto, Esq., hereby stipulate and agree that the
status conference set for August 11, 2006, be continued for an entry
of plea on September 1, 2006, at 9:00 a.m.

26 The parties have reached an agreement in principle and need
27 additional time to prepare the plea agreement. Therefore, the
parties have agreed and respectfully request that the Court set the
date of September 1, 2006, at 9:00 a.m., for entry of plea.
28 Accordingly, the parties stipulate that time be excluded for the

1 pendency of the previously filed motion pursuant to 18 U.S.C.
2 § 3161(h)(1)(F) and Local Code E - delay resulting from any pending
3 pretrial motion, and 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4
4 - additional time to prepare and due to the unavailability of
5 defense counsel and government's counsel.

6 || IT IS SO STIPULATED.

McGREGOR W. SCOTT
United States Attorney

Dated: August 9, 2006

By: /s/ William S. Wong
WILLIAM S. WONG
Assistant U.S. Attorney
Attorneys for Plaintiff

DATED: August 9, 2006

By: /s/ Peter Kmeto
PETER KMETO
Attorney for Defendant
RAHMAN ABUL SHADEBADI

ORDER

UPON GOOD CAUSE SHOWN and by stipulation of all parties, it is hereby ordered that this matter be set for further status conference and/or entry of plea as set forth above.

The Court finds excludable time as set forth above to and including September 1, 2006.

IT IS SO ORDERED.

Dated: August 10, 2006

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge